

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RUSTEM KAZAZI, et al.)	CASE NO.: 4:18-mc-00051-DAP
)	
Petitioners,)	JUDGE DAN AARON POLSTER
)	
v.)	
)	
U.S. CUSTOMS AND BORDER)	
PROTECTION, et al.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME
Respondents.)	
)	

Now come Respondents, by and through Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Assistant United States Attorneys Renée A. Bacchus and Lisa Hammond Johnson, and hereby move this Honorable Court for an extension of time until February 19, 2019, to file a response to Petitioners' Motion for Attorneys' Fees.

Pursuant to this Court's General Orders 2018-15 and 2019-1, this case was stayed during the recent lapse in appropriations funding the Department of Justice. In addition, this Court granted the parties' Joint Motion for an Extension of Time until January 30, 2019, within which Respondents could file their Response to the Petition.

However, Respondents' counsel was on furlough status during the lapse in appropriations. Accordingly, Respondents' counsel was prohibited from working on the Response to the Petition. Respondents' counsel returned to work on January 28, 2019 after the lapse in appropriations ended.

Because of the above circumstances, Respondents respectfully request that this Court grant an extension until February 19, 2019 within which Respondents may file their Response to the Petition.

Respondents' counsel has consulted with Petitioners' counsel, who has no objection to the requested extension.

Therefore, Respondents respectfully request that this Court grant them until February 19, 2019, within which to file their Response to the Petition.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney
Northern District of Ohio

s/Lisa Hammond Johnson
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Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2019, a copy of the foregoing Unopposed Motion for Extension of Time was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Lisa Hammond Johnson
Lisa Hammond Johnson
Assistant U.S. Attorney